

June 29, 2022

U.S. Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
Washington, DC 20590

Re: Amendment of Exemption 18662 for University of Hawai'i at Hilo – Spatial Data Analysis and Visualization Laboratory

To Whom It May Concern:

On September 2, 2020 the University of Hawai'i at Hilo – Spatial Data Analysis and Visualization Laboratory (UHH-SDAV) requested an exemption from Title 14, Code of Federal Regulations (14 CFR) 107.36; 137.19(c), (d), (e)(2)(ii), (e)(2)(iii), and (e)(2)(v); 137.31(a) and (b); 137.33(a) and (b); 137.41(c); and 137.42 to the extent necessary to allow UHH-SDAV to commercially operate a DJI Matrice 600, a small unmanned aircraft system (sUAS) weighing less than 55 pounds (lbs.), for agricultural aircraft operations. On November 29, 2020, the FAA granted exemption No. 18662 (FAA-2020-0861) to conduct agricultural aircraft operations using the requested sUAS. Exemption No. 18662 is set to expire on December 31, 2022. UHH-SDAV requests an amendment of this exemption to extend the duration of the exemption an additional 24 months and to include additional sUAS. These additional sUAS include:

- DJI Agras MG-1S
- DJI Agras T10

Along with its petition, to support its request for an amendment, UHH-SDAV provides the following proprietary and/or confidential supporting documents:

- CTAHR Aerial Pesticide Application Guide
- Supplement to CTAHR Aerial Pesticide Application for Unmanned Aircraft Systems – Multicopter
- Vegetated Sample Dispersal and Small Unmanned Aircraft System Operation Manual
- DJI Agras MG-1S User Manual
- DJI Agras T10 User Manual

UHH-SDAV believes that this amended exemption is in the public's interest as it would reduce hazards and emissions associated with alternate use of manned aircraft to conduct similar aerial applications. As this amended exemption is consistent with similar exemptions (i.e., Exemption No. 1148 Yamaha Motors Corporation and Exemption No. 17261 Drone Seed Co), UHH-SDAV respectfully submits that this exemption request is not precedent setting and therefore qualifies for expedited approval via the FAA's summary grant process.

If you have any questions, or need any additional information to process the requested amendment to Exemption No. 18662, please do not hesitate to contact the undersigned.

/s/ Ryan Perroy
Dr. Ryan Perroy

Petitioner
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